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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DORIS CROSLEY, et al.,) CASE NO.: C05-4051 JSW
Plaintiffs,)
vs.) STIPULATION FOR PROTECTIVE ORDER
CITY OF PITTSBURG, et)
al.,)
Defendants.)

The parties, by and through their respective attorneys of record, hereby stipulate and agree to the following protective order with respect to any and all documents from the personnel files of police officers of the Pittsburg Police Department produced by defendants in response to plaintiffs' Request for Production of Documents.

1. Said documents are to be shown only to plaintiffs' attorneys, support staff, and expert witnesses in the above-captioned litigation;
2. Said documents are not to be copied, except for use by plaintiffs' attorneys, support staff, and expert witnesses in the above-captioned litigation;

3. Said documents are not to be distributed, except to plaintiffs' attorneys, support staff, and expert witnesses in the above-captioned litigation;
4. Said documents, including all copies thereof, are to be destroyed or returned to counsel for defendants at the conclusion of this litigation;
5. Said documents are not to be filed in court, except under seal, absent a further agreement between the parties;
6. Any violation of the provisions of this protective order may result in the imposition of sanctions, to be determined by the above-entitled court, including monetary, issue and/or terminating sanctions.

DATED: January 29, 2007 PAOLI & GEERHART

PAOLI & GEERHART

Charles Geerhart
Attorneys for Plaintiffs

DATED: January 30, 2007 EDRINGTON, SCHIRMER & MURPHY

EDRINGTON, SCHIRMER & MURPHY

By: S
MICHAEL P. CLARK, Esq.
Attorney for Defendants

ORDER

Good cause appearing therefor, the Court hereby ORDERS, ADJUDGES AND DECREES that a protective order is issued in accordance with the terms and conditions set forth hereinabove. If the parties intend to file matters under seal, they must comply with Local Rule 79-5.

DATED: January 31, 2007

U.S. DISTRICT COURT JUDGE